

REMARKS

General remarks.

Claims 17-23, 25-27, and 86-97 are all the claims pending in the application.

Claim 16 has been canceled, and its dependent claims 17 and 18 rewritten in independent form. The Examiner indicated that such actions would result in the allowance of claims 17 and 18.

The Examiner maintained all of the prior art rejections as in the preceding Office Action, and indicated a difficulty in understanding Applicant's position. Applicant's position is clarified below on a claim-by-claim basis, focusing on the independent claims.

By way of introduction, Applicant first addresses the rejections based on Joubert, and then the rejections based on Kim.

Independent claim 20.

Claim 20 stands rejected under 35 U.S.C. § 102 as being anticipated by Joubert. In the Amendment filed August 26 (and re-submitted on October 18), Applicant pointed out that Joubert does not meet the requirement of claim 20 that there be "a plurality of predetermined IP addresses of the router".

In response, the Examiner wrote that Applicant's argument was thought to be "baffling" because Fig. 1 of Joubert clearly shows three IP addresses within box 13 (viz., the router).

Perhaps an analogy will help clear up the Examiner's bafflement as to Applicant's position.

How a letter carrier is like a router.

A letter carrier (postman) can be thought of as a kind of router between the post office and people on a delivery route. Suppose the letter carrier has a small delivery route, and picks up letters from the Merrifield post office for delivery to just the houses on N. 17th St. in Arlington. The houses on the delivery route each have an address, such as 4904 N. 17th St, 4906 N. 17th St,

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4908 N. 17th St, and the like. The collection of addresses for each of the houses on the route may be thought of as entries in the letter carrier's mental routing table.

How a letter carrier operates like a router

The letter carrier picks up a bundle of letters. Each letter is addressed to a house. Letters addressed to houses on the delivery route (i.e., ones whose addresses appear in the routing table) are delivered to the addressee. For example, the letter carrier finds a letter addressed to 4904 N. 17th St. The letter carrier sees that this letter is on the delivery route, and takes it to the house that has that address. In fact, he takes it to 4904 N. 17th St.

Suppose the letter carrier picks up a letter bearing an address for a house in Richmond. The letter carrier sees that the letter is not on the delivery route, and the letter carrier will not deliver the letter.

Thus, a letter carrier, like a router, performs his functions on items whose addresses are in its router table / on its delivery route and does not perform those functions on items whose addresses are not.

The point of the analogy.

Now, the letter carrier lives somewhere. Let's assume he lives in Sterling. He lives at 155 Newbury Place in Sterling. In other words, the address of the letter carrier is 155 Newbury Place. That address is not on the delivery route to N. 17th St in Arlington.

There is only one address of the letter carrier; he has only one address. He carries letters to many addresses on his delivery route, but none of those are his address. The address of the letter carrier is distinct from the addresses of the houses on N. 17th St. When you look in the letter carrier's bundle of things to deliver, you see lots of addresses which the letter carrier serves. But those addresses are not the address of the letter carrier; they are addresses of other places served by the letter carrier. The letter carrier can be said to have a table of addresses he serves, and can be said to have items for delivery to other addresses, but it cannot be said that the addresses of the letters are the address of the letter carrier.

There is only one address of the Joubert router; it has only one address. It delivers items to many addresses on its subnet (i.e., IP1 IP2 IPC6), but none of those are the router's own address. The router's own address is distinct from the addresses of the devices on the subnet. When you look at the router table of router 13, you see lots of addresses which the router serves. But those addresses are not the address of the router; they are addresses of other devices served by the router. The router can be said to have a router table indicating addresses served, and can be said to sometimes have items for delivery to those other addresses, but it cannot be said that the in the router table are addresses of the router.

The point Applicant desires the Examiner to glean is that the address of the router is not the same thing as an address that the router serves, and that therefore the addresses shown in the box 13 of Fig. 1 of Joubert are addresses the router serves but are not addresses of the router.

Returning to the express requirements of claim 20.

Claim 20 requires "a plurality of predetermined IP addresses of the router." That is to say, the router has to have a plurality of predetermined IP addresses.

Before the Amendment filed on August 26 (and re-submitted on October 18), the language of the claim was just "a plurality of predetermined IP addresses" and it was not expressly stated in the claim that the plurality of predetermined IP addresses were addresses of the router. The claim has since been amended, however, and because the claim requires "a plurality of predetermined IP addresses of the router," it is respectfully submitted to distinguish over the Joubert router table shown at reference numeral 13 of Fig. 1.

Applicant understands the duty of the Examiner to give claim terms their broadest reasonable interpretation, but the Examiner's present interpretation of this term in claim 20 is too broad. The Joubert reference provides no evidence whatever that there are a plurality of predetermined IP addresses of the router; Joubert can at most be said to stand for the proposition that a router stores multiple addresses of other devices in its internal router table (and this does not meet the express requirement of claim 20 that there be "a plurality of predetermined IP addresses of the router").

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Because Joubert's "clear depiction" in Fig. 1 is of only a routing table, and because a routing table does not meet the requirement of claim 20 for a plurality of predetermined IP addresses of the router, it follows that Joubert cannot in any reasonable manner be said to anticipate the subject matter of claim 20 within the meaning of 35 U.S.C. § 102.

This rejection of independent claim 20 therefore should be withdrawn, and such an action is respectfully requested of the Examiner.

Independent claim 25.

This claim stands rejected under 35 U.S.C. § 102 as being anticipated by Joubert. Like claim 20, this claim also expressly requires "a plurality of predetermined IP addresses of the router" and so, mutatis mutandis, the foregoing comments apply with equal force to this rejection of independent claim 25.

Independent claim 97.

In the Office Action mailed June 11, 2002, the Examiner allowed claim 97. In the present Office Action, claim 97 stands rejected under 35 U.S.C. § 102 as being anticipated by Joubert.

The Examiner did not explain why it is thought that Joubert anticipates claim 97. Applicant respectfully requests the Examiner to reconsider this rejection, and to withdraw it in view of the requirement of claim 97 that "said respective printer interface is not an IP-addressed connection." That is to say, the foregoing requirement, in combination with all of the other limitations of the claim, is respectfully submitted to patentably distinguish over Joubert.

In Joubert, the interfaces are all IP-addressed, and Joubert seems to provide no relevant teaching or suggestion as to how to handle an interface that is not an IP-addressed connection. Therefore, Joubert does not meet the limitations of the claim, and cannot be said to anticipate claim 97 within the meaning of 35 U.S.C. § 102.

In view of the foregoing points, Applicant respectfully requests the Examiner to withdraw the rejection of claim 97, and to once again indicate the allowability of the claim.

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Independent claim 86.

In the Office Action mailed June 11, 2002, the Examiner allowed claim 86. In the present Office Action, claim 86 stands rejected under 35 U.S.C. § 102 as being anticipated by Kim.

In making this rejection, the Examiner read the requirement for network communication means as the router 7 apparently in combination with the LAN 15. The Examiner also read the requirement for "said respective printer interface" on NIB 14 of Kim. Claim 86 requires that "said respective printer interface is not an IP-addressed connection; the Examiner asserted that "the printer interface (14) is not an IP-addressed connection (the NIB is not an IP addressed connection)."

Kim, however, teaches that the NIB is an IP addressed connection. That is to say, LAN 15 supports IP communications (column 3, lines 52-55). The NIB communicates with IP packets (column 4, line 14). The NIB is an interactive network device that interfaces the copier 11 to the LAN 15 (column 4, lines 24 and 25). Because the respective printer interface is (in the case of the Kim NIB) an IP-addressed connection, this makes "the copier 11 a responsive and interactive network member." (column 4, lines 25-6).

Applicant's invention is different. An important point in the embodiment defined in claim 86 is that, in spite of the fact that the selected printer has a non-IP addressed interface, it can nonetheless be made "accessible to a network" in which it might not ordinarily be able to participate. Claim 86 requires the printer interface "is not an IP-addressed connection" and the Kim NIB does not meet this requirement.

The Examiner's reading of the requirements of claim 86 on the teachings of Kim does not therefore make out even a prima facie case for anticipation. Applicant therefore respectfully requests the Examiner to reconsider this rejection, and to withdraw it in view of the foregoing points. Applicant furthermore respectfully requests the Examiner again to indicate the allowability of independent claim 86 over the prior art, and also the allowability of dependent claims 87-90.

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Independent claim 91.

This claim stands rejected under 35 U.S.C. § 102 as being anticipated by Kim. Like claim 86, this claim also expressly requires "said respective printer interface is not an IP-addressed connection" and so, *mutatis mutandis*, the foregoing comments apply with equal force to this rejection of independent claim 91 and its dependent claims 92-94; the Examiner is thus respectfully requested to again indicate the allowability of claims 91-94.

Conclusion and request for telephone interview.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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